

Exhibit 1

(To the October 15, 2021 Declaration of
Michael T. Mervis)

Dalsen, William D.

Subject: RE: Shah

From: Mervis, Michael T.
Sent: Thursday, September 30, 2021 3:00 PM
To: 'Koff, Douglas' <Douglas.Koff@srz.com>
Cc: 'Joseph, Andrew B' <andrew.joseph@dbr.com>
Subject: RE: Shah

Doug – Regarding Ojas and the BIT reports, we can represent the following:

(i) he was personally involved in the preparation of the BITs, (ii) he led the team that was responsible for preparing the BITs, (iii) he reviewed and approved of all language in the BITs (understanding of course that he accepted assumptions from legal advisors and financial advisors as presented), and (iv) there is no other person at McKinsey more knowledgeable about the BITs than Ojas

Please let us know if this works. Although I believe this has been implicit, are we agreed that, if this works for you, it will relieve McKinsey of whatever document subpoena obligations it may have?

Thanks.

Michael T. Mervis
Partner and Vice Chair –
Commercial Litigation Group

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mmervis@proskauer.com

From: Koff, Douglas <Douglas.Koff@srz.com>
Sent: Thursday, September 30, 2021 9:57 AM
To: Mervis, Michael T. <MMervis@proskauer.com>
Subject: RE: Shah

This email originated from outside the Firm.

Ok, it might not give us enough time on our Motion in Limine but if it does we can alter it depending on the answer.

Douglas I. Koff
Partner
212.756.2773 office
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Schulte Roth & Zabel LLP
www.srz.com

From: Mervis, Michael T. <MMervis@proskauer.com>
Sent: Thursday, September 30, 2021 9:55 AM
To: Koff, Douglas <Douglas.Koff@srz.com>
Subject: RE: Shah

-CAUTION: EXTERNAL EMAIL from mmervis@proskauer.com
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Working on this. Andrew Joseph, who reps McKinsey, is in a deposition this morning so I will likely not be back to you until later in the day. It seems doable.

Michael T. Mervis
Member of the Firm

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From: Koff, Douglas <Douglas.Koff@srz.com>
Sent: Wednesday, September 29, 2021 5:30 PM
To: Mervis, Michael T. <MMervis@proskauer.com>
Subject: Shah

This email originated from outside the Firm.

Do you have a minute to follow-up? I am on my cell below and free.

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